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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

NICHOLAS DILLON,

Defendant.

Case:2:21-cr-20047
Judge: Hood, Denise Page
MJ: Whalen, R. Steven
Filed: 01-27-2021 At 04:55 PM
USA V SEALED MATTER (LG)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
RECIEPT OF CHILD PORNOGRAPHY
(18 U.S.C. §§ 2252A(a)(2) and 2252A(b)(1))

On or about May 13, 2020, in the Eastern District of Michigan, NICHOLAS DILLON knowingly received material that contained child pornography, as defined in 18 U.S.C. § 2256(8)(A), that the child pornography had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, including a computer; and that the child pornography was produced using materials that had been mailed, shipped and transported in interstate and foreign commerce by any means, including a computer.

COUNT TWO
RECEIPT OF CHILD PORNOGRAPHY
(18 U.S.C. §§ 2252A(a)(2) and 2252A(b)(1))

On or about June 6, 2020, in the Eastern District of Michigan, NICHOLAS DILLON knowingly received material that contained child pornography, as defined in 18 U.S.C. § 2256(8)(A), that the child pornography had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, including a computer; and that the child pornography was produced using materials that had been mailed, shipped and transported in interstate and foreign commerce by any means, including a computer.

FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

Upon conviction of Count One and/or Count Two alleged in this Indictment, NICHOLAS DILLON, shall, pursuant to 18 U.S.C. § 2253, forfeit to the United States the following:

- i. Any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of these subsections;

- ii. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- iii. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

If any of the property described in the paragraphs above as being forfeitable pursuant to 18 U.S.C. § 2253, as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America, pursuant to 21 U.S.C. § 853(p), intends to seek forfeiture of all other property of the defendant up to the value of the above described forfeitable property.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

MATTHEW SCHNEIDER
United States Attorney

MATTHEW A. ROTH
Chief, Major Crimes Unit


s/Christopher W. Rawsthorne
CHRISTOPHER W. RAWSTHORNE
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Dated: January 27, 2021

United States District Court Eastern District of Michigan	Criminal Case Cover
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete i

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: 

Case Title: USA v. NICHOLAS DILLON

County where offense occurred : Macomb

Check One: ☒ **Felony**

☒ **Misdemeanor**☐ Petty

✓ Indictment/ Information - **no** prior complaint.

Indictment/ Information --- based upon prior complaint [Case number:

Indictment/ Information --- based upon LCrR 57.10 (d) *[Complete Superseding section below]*.

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

January 27, 2021

Date _____

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Attorney Bar #: WI 1059889

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.